

THE HONORABLE ROBERT S. LASNIK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA;
COLEHOUR BONDERA and MELANIE
BONDERA, husband and wife d/b/a
KANALANI OHANA FARM; and ROBERT
SMITH and CECELIA SMITH, husband and
wife d/b/a SMITH FARMS, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION, a
Washington corporation; AMAZON.COM,
INC., a Delaware corporation; HAWAIIAN
ISLES KONA COFFEE, LTD., LLC, a
Hawaiian limited liability company; COST
PLUS/WORLD MARKET, a subsidiary of
BED BATH & BEYOND, a New York
corporation; BCC ASSETS, LLC d/b/a
BOYER'S COFFEE COMPANY, INC., a
Colorado corporation; JAVA LLC, a
Michigan limited liability company;
MULVADI CORPORATION, a Hawaii
corporation; COPPER MOON COFFEE,
LLC, an Indiana limited liability company;
GOLD COFFEE ROASTERS, INC., a Florida
corporation; CAMERON'S COFFEE AND
DISTRIBUTION COMPANY, a Minnesota
corporation; PACIFIC COFFEE, INC., a
Hawaii corporation; THE KROGER CO., an
Ohio corporation; WALMART INC., a

Case No. 2:19-cv-00290-RSL

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEFENDANT
COST PLUS, INC.'S TIME TO FILE
AN ANSWER TO THE FIRST
AMENDED COMPLAINT**

STIPULATION EXTENDING TIME TO RESPOND TO
COMPLAINT - 1

No. 2:19-cv-00290-RSL

132706.0001/7925384.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

1 Delaware corporation; BED BATH &
2 BEYOND INC., a New York corporation;
3 ALBERTSONS COMPANIES INC., a
4 Delaware Corporation; SAFEWAY INC., a
5 Delaware Corporation; MNS LTD., a Hawaii
6 Corporation; MARMAXX OPERATING
7 CORP. d/b/a T.J. MAXX and MARSHALLS,
8 a Delaware corporation; SPROUTS
9 FARMERS MARKET, INC. a Delaware
10 corporation; JOHN DOE CO. 1-20

11 Defendants.

12 I. STIPULATION

13 Plaintiffs and Defendant Cost Plus, Inc. ("Defendant") by and through their attorneys,
14 hereby stipulate to extend the deadline for Defendant to file an answer to Plaintiffs' First
15 Amended Complaint, by an additional 30 days, through and including February 12, 2020.
16 Neither Plaintiffs nor Defendant believe that this extension will unduly delay case progress.

17 Plaintiffs and Defendant agree and acknowledge that each of them do not waive and
18 hereby specifically reserve all of their claims and defenses.

19 DATED: January 9, 2020.

20 KARR TUTTLE CAMPBELL

21 /s/ Nathan Paine

22 Nathan Paine, WSBA #34487

23 Paul Richard Brown, WSBA #19357

24 Daniel T. Hagen, WSBA #54015

25 Mark A. Bailey, WSBA #26337

26 701 Fifth Avenue, Suite 3300

27 Seattle, WA 98104

Email: npaine@karrtuttle.com

pbrown@karrtuttle.com

dhagen@karrtuttle.com

m Bailey@karrtuttle.com

Attorneys for Plaintiffs

STIPULATION EXTENDING TIME TO RESPOND TO
COMPLAINT - 2

No. 2:19-cv-00290-RSL

132706.0001/7925384.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP

By /s/Andrew R. Kaufman
Andrew R. Kaufman, *pro hac vice*
Jason L. Lichtman, *pro hac vice*
Daniel E. Seltz, *pro hac vice*
Michael W. Sobol, *pro hac vice*
Email: akaufman@lchb.com
Email: jlichtman@lchb.com
Email: dseltz@lchb.com
Email: msobol@lchb.com

LANE POWELL PC

/s/Erin M. Wilson
Erin M. Wilson, WSBA #42454
Jessica Walder, WSBA #47676
Tiffany Scott Connors, WSBA #41740
Email: wilsonem@lanepowell.com
walderj@lanepowell.com
connorst@lanepowell.com

BRYAN CAVE LEIGHTON PAISNER LLP

By s/Merrit M. Jones
Merrit M. Jones, (*pro hac vice*)
Marcy J. Bergman, (*pro hac vice*)
3 Embarcadero Ctr. 7th Flr
San Francisco, CA 94111
Email: merrit.jones@bclplaw.com
Email: marcy.bergman@bclplaw.com

Attorneys for Defendant Cost Plus Inc.

STIPULATION EXTENDING TIME TO RESPOND TO
COMPLAINT - 3

No. 2:19-cv-00290-RSL

132706.0001/7925384.1


LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107

ORDER

Based on the foregoing Stipulation between the parties,

IT IS SO ORDERED.

DATED this 10th day of January, 2020.



The Honorable Robert S. Lasnik
United States District Court Judge

STIPULATION EXTENDING TIME TO RESPOND TO
COMPLAINT - 4

No. 2:19-cv-00290-RSL

132706.0001/7925384.1

LANE POWELL PC
1420 FIFTH AVENUE, SUITE 4200
P.O. BOX 91302
SEATTLE, WA 98111-9402
206.223.7000 FAX: 206.223.7107